

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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KATHRYN KNOWLTON, and  
DANA McCORMICK, et al,

Case No. 20-CV-01660

Plaintiffs,

v.

CITY OF WAUWATOSA, BARRY WEBER,  
In his individual capacity as Chief of Police, and  
DENNIS MCBRIDE in his individual capacity, et al.

Defendants.

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DEPOSITION OF DENNIS MCBRIDE

DATE TAKEN: June 23, 2021

TIME: 9:23 a.m. - 1:31 p.m.

LOCATION: Knowlton Law Group  
7219 West Center Street  
Wauwatosa, Wisconsin 53210

~~Miriam Beckford, Professional Court Reporter~~

deposition transcripts?

A No.

Q Did you look at the video of the deposition?

A No.

Q Okay. And you haven't spoken to Chief Weber since May. What date was that?

A I don't know.

Q Okay. So with regards to your conversations with Mr. Archambo, where your attorney was not present; what did you discuss in preparation for today?

A When it was going to be. That he was going to be present.

Q And whose idea was that for him to be present today?

ATTORNEY BAYNARD: I'm going to instruct him not to answer on the basis of attorney/client privilege.

Q Why is he here?

ATTORNEY BAYNARD: Same objection.

Q Why didn't you show up for the prior deposition?

ATTORNEY BAYNARD: Same objection.

ATTORNEY KNOWLTON: And you can object, he still has to answer the question.

MAYOR MCBRIDE: You're not a lawyer here.

(Overlapping Discussion)

MAYOR MCBRIDE: I don't want questions from three lawyers at one time. Can you just, please,

confine it to one at a time and I'll be happy to answer --

ATTORNEY MOTLEY: This isn't your deposition and she is an attorney here --

MAYOR MCBRIDE: That's -- not how you're supposed to conduct depositions.

(Overlapping discussion)

ATTORNEY BAYNARD: So I'm not sure what the last question was.

BY ATTORNEY SCHWAB:

Q Okay. Are you claiming attorney/client privilege over whose idea it was for Mr. Archambo to be present?

ATTORNEY BAYNARD: Yes. I'm going to instruct him not to answer about that topic. As well as attorney/client privilege and our legal strategy as to why he did not appear or why I instructed him not to appear for his, previously, noticed deposition. And what was the last question?

ATTORNEY MOTLEY: And are you also claiming attorney/client privilege for the conversations that he's had with Mr. Archambo when you have not been present?

ATTORNEY BAYNARD: No. And, I think, I mad that clear. Any conversation that did not involve me or the city attorney counsel, there is no attorney/client